



## North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

January 9, 2009

Mr. Gary Goeke  
Minerals Management Service  
Gulf of Mexico OCS Region  
1201 Elmwood Park Boulevard  
New Orleans, LA 70123-2394

Re: Comments on the Call for Information and Interest/Nominations for  
Proposed Sale 220 (Call); and Comments on the Notice of Intent for  
Proposed Sale 220 (NOI)

Dear Mr. Goeke:

On behalf of the N.C. Department of Environment and Natural Resources, I am writing to express our concerns related to the Call for Information and Notice of Intent related to the Proposed Oil and Gas Lease Sale 220 published in the November 13, 2008 Federal Register.

As our previous correspondence on this matter has outlined, North Carolina continues to be concerned with the potential adverse impacts to the coastal resources of the state associated with a lease sale off of the coast of Virginia. The review of the Draft Environmental Impact Statement by North Carolina's environmental agencies identified deficiencies that led me to recommend that the Minerals Management exclude the lease sale off the coast of Virginia in the final 2007-2012 Lease Program.

In addition to the omission of critical information and generalizations regarding the activities of marine mammals and fisheries, there is no in-depth analysis of the impacts the Proposed Lease Sale 220 would have on North Carolina. Based on the proximity of the proposed lease sale to the Albemarle-Pamlico estuarine system all potential environmental impacts to this unique resource should be carefully examined.

Furthermore, due to the potential short and long term consequences of oil and gas exploration on our marine resources and tourism in North Carolina any environmental review for a proposed lease sale off the coast of Virginia should include a thorough analysis of the environmental and socioeconomic impacts on North Carolina's coastal zone. It is our state's position that the proposed lease sale is subject to consistency review under the Federal Coastal Zone Management Act of 1972, as amended, and will require the Minerals Management Service to submit a consistency decision to the North Carolina Division of Coastal Management for review.

The stewardship of the natural resources of the coastal region is of critical importance to North Carolina. Our commercial fishing and tourism interests are of particular importance the state's economy and any and all potential impacts resulting from a lease sale off of the Virginia coast need to be carefully examined relative to our state.

Thank you for the opportunity to comment and for your consideration of these comments. If you need any further information from the department or have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, reading "William G. Ross, Jr." with a stylized flourish at the end.

William G. Ross, Jr.  
Secretary